

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
TACOMA

The Honorable Benjamin H. Settle

TROY SLACK, JACOB GRISMER,  
RICHARD ERICKSON, SCOTT PRAYE,  
GARY H. ROBERTS, ROBERT P. ULRICH,  
HENRY LEDESMA, TIMOTHY HELMICK,  
DENNIS STUBER, ERIC DUBLINSKI,  
SEAN P. FORNEY, individually, and on  
behalf of the Certified Class,

Plaintiffs,

v.

SWIFT TRANSPORTATION CO. OF  
ARIZONA, LLC,

Defendant.

CLASS ACTION

No. 3:11-cv-05843-BHS

**DECLARATION OF ANGELA J.  
MASON IN SUPPORT OF PLAINTIFFS'  
MOTION FOR APPROVAL OF NOTICE  
PLAN AND NOTICE FORM**

Note on Motion Calendar: [05-22-15]

Complaint Filed: September 9, 2011

**DECLARATION OF ANGELA J. MASON**

I, ANGELA J. MASON, hereby declare and state as follows:

1. I am an attorney admitted to practice before the state and federal courts in the State of Alabama. I am admitted Pro Hac Vice to the United States District Court for the Western District of Washington. I am a Partner with the Cochran Firm and counsel for the Plaintiffs in the above-styled case. I have personal knowledge of the following and, if called and sworn as a witness, I could and would competently testify thereto.

2. **Exhibit 1** is a true and accurate copy of Plaintiffs' Proposed Notice.

3. **Exhibit 2** is a true and accurate copy of Plaintiffs' Notice Plan.

4. **Exhibit 3** is a true and accurate copy of the Declaration of Plaintiff Jacob Grismer, including the attachment authenticated by Jacob Grismer through his Declaration.

1           5.       **Exhibit 4** is a true and accurate copy of the deposition of Tim Helmick taken in  
2 this matter and includes portions of the depositions marked or highlighted by Plaintiffs' counsel  
3 pursuant to local rule.

4           6.       **Exhibit 5** is a true and accurate copy of the deposition of Dennis Stuber taken in  
5 this matter and includes portions of the depositions marked or highlighted by Plaintiffs' counsel  
6 pursuant to local rule.

7           7.       **Exhibit 6** is a true and accurate copy of the deposition of Robert Ullrich taken in  
8 this matter and includes portions of the depositions marked or highlighted by Plaintiffs' counsel  
9 pursuant to local rule.

10          8.       **Exhibit 7** is a true and accurate copy of Exhibit 6 to the deposition of Sarah  
11 Koogler taken in this matter.

12          9.       **Exhibit 8** is a true and correct copy of Swift's version of a suitable notice in a  
13 previous Class Action matter which was certified in the Superior Court of Arizona, Maricopa  
14 County.

15          10.       **Exhibit 9** is a true and accurate copy of Plaintiffs' Amended Requests for  
16 Production of documents for Class Notice.

17          11.       **Exhibit 10** is a true and accurate copy of Defendant's Responses to Plaintiffs'  
18 Amended Request for Production for Class Notice.

19          12.       **Exhibit 11** is a true and accurate copy of the deposition of Michael Ruchenski  
20 taken in this matter and includes portions of the depositions marked or highlighted by Plaintiffs'  
21 counsel pursuant to local rule.

22  
23       Date: May 8, 2015.

24                               /s/ Angela J. Mason  
25                               ANGELA J. MASON

1 DATED this 8<sup>th</sup> day of May, 2015.

2  
3  
4 THE COCHRAN FIRM – DOTHAN, PC

5 /s/ Angela J. Mason

6 **ANGELA J. MASON** (Admitted Pro Hac Vice)

7 [angelamason@cochranfirm.com](mailto:angelamason@cochranfirm.com)

8 **JOSEPH D. LANE** (Admitted Pro Hac Vice)

9 [jlane@cochranfirm.com](mailto:jlane@cochranfirm.com)

10 **J. FARREST TAYLOR** (Admitted Pro Hac Vice)

11 [ftaylor@cochranfirm.com](mailto:ftaylor@cochranfirm.com)

12 111 East Main Street

13 Dothan, Al 36301

14 (334)673-1555

15 **DEBORAH M. NELSON, WSBA #23087**

16 [nelson@nelsonboydlaw.com](mailto:nelson@nelsonboydlaw.com)

17 **JEFFREY D. BOYD, WSBA #41620**

18 [boyd@nelsonboydlaw.com](mailto:boyd@nelsonboydlaw.com)

19 **NELSON BOYD, PLLC**

20 411 University Street, Ste 1200

21 Seattle, WA 98010

22 (206) 971-7601

23 **ROBERT J. CAMP**

24 [rcamp@wcqp.com](mailto:rcamp@wcqp.com)

25 **WIGGINS, CHILDS, QUINN & PANTAZIS**

26 301 19<sup>th</sup> Street North

27 Birmingham, Alabama 35203

28 (205) 314-0500

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, hereby certify that on this 8<sup>th</sup> day of May 2015, the foregoing was electronically filed with the Clerk of the United States District Court for the Western District of Washington, Seattle, using the CM/ECF system, which will send notification of such filing to the below counsel:

Rudy A. Englund, Esq.

[EnglundR@LanePowell.com](mailto:EnglundR@LanePowell.com)

**Lane Powell, PC**

1420 Fifth Avenue, Suite 4100  
Seattle, WA 98101-2338

Ellen Brochetti, Esq.

[Ebrochetti@sheppardmullin.com](mailto:Ebrochetti@sheppardmullin.com)

Paul Cowie, Esq.

[pcowie@sheppardmullin.com](mailto:pcowie@sheppardmullin.com)

**Sheppard Mullin Richter & Hampton LLP**

379 Lytton Avenue  
Palo Alto, CA 94301-1479

/s/Angela J. Mason

**ANGELA J. MASON**